



North Pacific Fishery Management Council

Angel Drobnica, Chair

1007 West 3rd Ave, Suite 400

Anchorage, Alaska 99501

Re: C-2, Chum salmon bycatch initial review analysis

Dear Madam Chair Drobnica,

Bering North LLC owns and operates 8 AFA shoreside catcher vessels that participate in the Bering Sea pollock, cod and GOA groundfish trawl fisheries. Annually we employ nearly 40 people on our vessels. Bering North is majority-owned by a partnership of CDQ groups. The Alaskan pollock fishery in the Eastern Bering Sea produces affordable, sustainable, and American-produced seafood, widely recognized as one of the best managed fisheries in the world. We are proud to play a role in this fishery and appreciate the opportunity to comment on C-2, Chum salmon bycatch review.

We appreciate the iterative approach that the Council is taking to refine the alternatives to allow for additional public and pollock sector input. In its current form, the Chum Salmon Bycatch DEIS lacks information on the unintended consequences created by avoidance of Russian and Asian hatchery chum that would likely occur under a hard cap, and distribution of economic and safety impacts on smaller CVs that rely on the Catcher Vessel Operational Area in the B season. We urge the Council to focus the analysis on bolstering the elements within Alternative 4 with additional measures to be included in IPAs to better avoid Western Alaska chum and balance the trade-offs between PSC species.

Avoiding salmon bycatch, including Western Alaska chum salmon bycatch in the B season pollock fishery, is of paramount importance to our fleet. Our vessels participated in both salmon excluder EFPs, and as a company have required our vessels to use excluders 100% of the time, before it was a regulatory requirement. Our fleet takes pride in our work to constantly improve our bycatch via a strong focus on communication, our captains' local knowledge accumulated over decades of experience in the Bering Sea pollock fishery, and improvements in our gear. These efforts are complementary to the requirements found in the inshore IPA to reduce Chinook and chum salmon bycatch. The pollock fleet has been constantly adapting fishing practices for the last 2 decades to respond to changing ocean and climate conditions which drive a dynamic bycatch landscape.

1. A Hard Cap on Chum is the Wrong Fisheries Management Tool to Avoid Western Alaskan Chum

A hard cap is an unnecessarily blunt instrument for the Council to consider, is not responsive to the purpose and need statement to avoid Western Alaska chum and does not meet the requirements to balance the National Standards. Specifically, a chum salmon hard cap contradicts NS 1 by reducing the ability for the fishery to achieve OY on a continuing basis; NS 5, as it does not achieve the most efficient fishery as practicable or desirable; NS 6, as it does not account for nor provide contingencies for increasing Asian hatchery chum production; and NS 8, as it disproportionately impacts the coastal communities of Dutch Harbor and Akutan. The Council should recognize that chum salmon incidental catch is a fundamentally different fisheries management problem than the bycatch of Western Alaskan chinook in the Bering Sea and requires a different set of solutions than a hard cap such as one found in Amendment 91. While fishermen can reasonably expect most incidental catch of Chinook to be bound for Alaska at some point, they cannot distinguish between non-WAK and WAK chum when harvesting.

In recent years, chum salmon incidentally caught in the Bering Sea are predominantly non-Western Alaskan chum. In 2023¹, 9 out of 10 chum incidentally caught were not bound for Western Alaska. Seven of ten chum were from NE and SE Asia. The massive increases in hatchery chum release in Asia and Russia has dramatically increased the probability that BS pollock vessels will encounter chum salmon in their directed catch. Since we do not have real-time, in-season genetic data, these encounters have created a great deal of uncertainty on the fishing grounds and within sectors as they manage the PSC trade-offs inherent in all fishing and IPA decisions (i.e. rolling hot spot closure sizes, displacement of fishing effort, other PSC considerations, etc.)

One compounding factor that was not well-addressed in the analysis is that many vessels are limited by the size and horsepower of each vessel. Each vessel has characteristics which constrain it from fishing in some locations in the Bering Sea. For example, horsepower dictates the depth at which a vessel can target pollock. Typically, chum salmon travel at depths of 60-80 fathoms, and fishing in deeper water is one tool that vessels can use to avoid chum. Several of our vessels' engine horsepower do not exceed 1300 HP, which limits their fishing activity to depths in which they may encounter more chum. Additionally, smaller vessels are extremely limited from traveling beyond the east side of St. George due to safety concerns, vessel capacity and horsepower. Once a vessel brings fish onboard, they are limited in their options to achieve full capacity before they have to head back to their shoreside processor. This is why the CVOA is so important to the catcher vessel fleet.

¹ <https://meetings.npfmc.org/CommentReview/DownloadFile?p=93adc8a8-9284-4731-b492-74d535241a78.pdf&fileName=C2%20Chum%20Salmon%20Genetics%20Report.pdf>

Below is a table of the Northern Victor cooperative’s vessels’ approximate allocations if a hard cap were in place, for illustrative purposes only. The list includes all 2024 NV Coop member vessels, including Bering North vessels.

Shoreside Hard Cap (Approx. from Motion)		100,000	125,000	175,000	200,000	250,000
Coop Percentage						
Vessel 1	11.47%	1,072	1,339	1,875	2,143	2,679
Vessel 2	1.32%	123	154	215	246	308
Vessel 3	4.56%	426	533	746	853	1,066
Vessel 4	5.77%	539	674	944	1,079	1,349
Vessel 5	3.27%	306	382	535	611	764
Vessel 6	6.43%	601	752	1,052	1,202	1,503
Vessel 7	0.77%	72	90	126	144	180
Vessel 8	4.46%	417	521	730	834	1,043
Vessel 9	0.62%	58	72	101	116	144
Vessel 10	13.16%	1,230	1,538	2,153	2,461	3,076
Vessel 11	16.64%	1,555	1,944	2,721	3,110	3,887
Vessel 12	13.09%	1,224	1,529	2,141	2,447	3,059
Vessel 13	5.39%	503	629	881	1,007	1,258
Vessel 14	13.05%	1,219	1,524	2,134	2,438	3,048
	Total	9,346	11,682	16,355	18,691	23,364

These are absolute chum caught, meaning that up to 90% of the chum in these tables could be Asian and Russian hatchery chum. The vessels with the smallest AFA quotas, and typically the smallest capacities, would be precluded from pollock fishing in many B seasons under a hard cap. These vessels are already facing bleak prospects with inflation increasing their costs to operate, and groundfish markets dropping to historic lows. In more stark terms, these vessels would likely exit the fishery, increasing consolidation, reducing fisheries employment, decreasing demand for shoreside services, and further eroding coastal Alaska communities’ diversification and resilience. The lopsided distributional impacts of a hard cap must be considered, and these impacts would fall most heavily on the smallest of pollock vessels that are constrained to fish closer to their shoreside processors. The Council must weigh these consequences largely against saving Asian and Russian hatchery chum, which is the result of a hard cap.

2. Alt. 4 is Responsive to the Council’s Motion, Consistent and Aligned with past FMP Amendments, and the Superior Tool to Avoid WAK Chum

This is a complex fisheries management problem and requires sophistication and complexity. The Council has dynamic and responsive tools found in the CV Intercooperative group’s proposal that speak directly to the purpose and need of the motion. Chum bycatch occurs in concentrated areas and at unpredictable intervals, and the only way to know if there are chum in the pollock is after harvest. The entire concept of the RHS program is rooted in these fundamental assumptions. They are post-harvest closures. Our best accumulated local knowledge indicates that chum are not static and travel rapidly through the Bering Sea, which requires a flexible and dynamic approach to

the management of fleet effort. Paired with an improving understanding of the temporal and spatial incidence of WAK chum, the pollock industry is better situated to make probabilistic estimates on the presence of Western Alaska chum throughout the B season. Undergirding this is a trusted and proven capacity for on the grounds communication and a precautionary approach to PSC avoidance. Unlike Alt 2. and Alt. 3, this approach is consistent with the National Standards, given that it promotes OY, reduces bycatch to the extent practicable, provides contingencies for variability in a resource, and lessens the impacts on coastal Alaskan fishing communities. Bering North strongly supports the approach outlined by the Intercooperative catcher vessel group's proposal.

Lastly, I would comment on the use of data for indices for forward-looking management decisions, including time and area closures. These depend on consistent allocations of resources at a governmental level, where budgetary considerations may preclude funding for the sources of the data that make up these indices, at any time. For example, despite evidence of an explosion in the herring population in the BSAI, ADF&G is using a 10-year weighted average to set the annual BSAI herring PSC limit due to budget constraints and the lack of a commercial fishery. This has resulted in a mismatch between what the pollock fleet encounters in the Bering Sea and the cap amount that the fleet is managing under. We urge the Council to avoid tying management decisions to a static index.

Thank you for the opportunity to comment on this important topic.

Sincerely,

Hunter Berns

General Manager

Bering North LLC